

Before the
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Glenclyff Post Office
Glenclyff, New Hampshire

Docket No. A2012-29

PUBLIC REPRESENTATIVE COMMENTS
OPPOSING REMAND
(January 18, 2012)

After careful review of the Postal Service's Final Determination, the materials in the Administrative Record, the arguments presented by Petitioners, and the Postal Service Comments, the Public Representative concludes that the Postal Service has followed applicable procedures, that the decision to close the Glenclyff Post Office is neither arbitrary nor capricious, and that the Postal Service's decision is supported by substantial evidence. However, there is an error in the calculation of economic savings.

After the closing of the Glenclyff Post Office, the Postal Service will provide rural carrier delivery to Glenclyff residents.¹ The Postal Service estimates that rural delivery will cost \$6,783 per year. FD at 9. The calculations underlying this estimate appear on the Rural Route Cost Analysis Form at page 2 of Item 17 of the Administrative Record (AR). One of the numbers used in the calculations is the hourly wage for rural carriers. The wage rate appearing on the form is \$22.61. This wage rate is significantly lower than what appears in other recent administrative records.²

The instructions on the cost analysis form state that the wage rate should be obtained from "national payroll summary report—rural carrier, consolidated." The value \$22.61 appears to derive from the report for pay period 7, FY 2011, dated March 29,

¹ Final Determination, November 7, 2011, at 10 (FD).

² See, e.g., Docket No. A2012-28, AR, Item 17, at 2, November 4, 2011 (\$34.88).

2011.³ The value appearing at the top of the right-most column of that report is \$22.6053, which rounds to \$22.61. That value does not include benefits. However, the costs that will be saved by closing the Glenclyff Post Office include the salary *and benefits* of a postmaster. See FD at 9. Therefore, the comparable rural carrier costs should (and usually do) include benefits.

Respectfully submitted,

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³ http://www.prc.gov/Docs/72/72535/Payroll_Hours_PP07.pdf, April 20, 2011.